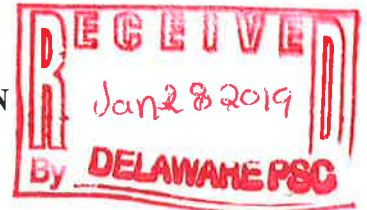


BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE



IN THE MATTER OF THE FORMAL *
COMPLAINT OF RICHARD SPINKS DBA *
GIGGLEBUGS, LLC AGAINST DELMARVA *
POWER & LIGHT COMPANY REGARDING *
THE DETERMINATION OF A TARIFF RATE *
CATEGORY (FILED NOVEMBER 8, 2018) *

PSC DOCKET NO. 18-1194

* * * * *

**PETITION TO INTERVENE OF
CLEAN ENERGY USA, INC.**

Petitioner, Clean Energy USA, Inc. ("CEUSA"), by counsel, petitions the Commission to intervene in the above-captioned proceeding and, and as grounds therefore, states as follows:

1. CEUSA is a commercial and residential solar energy facility system installer in Delaware. CEUSA is based in Rehoboth Beach, Delaware, and serves customers throughout the State. CEUSA's customers in the Delmarva Power & Light Company ("Delmarva") service territory receive service from Delmarva pursuant to Delmarva's Electric Tariff.
2. On November 8, 2018, Richard Spinks of GiggleBugs, LLC filed a Formal Complaint against Delmarva regarding Delmarva's interpretation and application of its Tariff as it applies to the determination of rate category for net metered customers.
3. On December 5, 2018, Delmarva filed an Answer responding to Mr. Spinks' Complaint.
4. On December 12, 2018, the proceeding was referred to Senior Hearing Examiner Mark Lawrence for further proceedings.
5. On December 18, 2018, the Agreed Procedural Schedule was filed, setting an Intervention Deadline of January 25, 2019.

6. CEUSA is interested in the Tariff interpretation issues under consideration in this proceeding, which will directly impact net metering customers in Delaware, including CEUSA's current and prospective customers. Complainant is a customer of CEUSA.

7. CEUSA's experience in delivering renewable energy solutions to Delaware customers enables it to bring a unique perspective the tariff interpretation issues under consideration in this proceeding and the potential effects on the Delaware renewable energy market.

8. All correspondence to CEUSA should be addressed to CEUSA counsel at the following addresses:

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1201 N. Orange Street, Suite 300
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Eric J. Wallace
GREENEHURLOCKER, PLC
1807 Libbie Avenue, Suite 102
Richmond, Virginia 23226
Tel: 804.672.4544 (direct)
ewallace@greenehurlocker.com
(Motion for Admission *Pro Hac Vice* pending)

9. Any decision by the Commission with respect to interpretation of Delmarva's tariff could affect CEUSA's interests and the interests of CEUSA's customers. CEUSA's interests are not now, nor will they be, adequately represented by any other party.

WHEREFORE, CEUSA requests that this Commission allow it to intervene in this proceeding as a party, with all rights attendant thereto.

Respectfully submitted,

Clean Energy USA, Inc.

By Counsel

/s/ Ronald S. Gellert

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-and-

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(Motion for Admission *Pro Hac Vice* pending)

Counsel for Clean Energy USA, Inc.

Dated: January 25, 2019

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Petition to Intervene was sent via Delafile and first class mail, postage pre-paid, on January 25, 2019, to all those identified on the service list for Docket No. 18-1194.

Richard Spinks GiggleBugs, LLC 213 West State Street Millsboro, DE 19966	Todd L. Goodman, Esq. 500 North Wakefield Drive Newark, DE 19702
Mark Lawrence Raj Barua Donna Nickerson Jerry Platt Delaware Public Service Commission 861 Silver Lake Blvd Cannon Bldg, Ste 100 Dover, DE 19904	Lindsay B. Orr, Esq. 92DC42 P.O. Box 6066 Newark, DE 19714
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/s/ Ronald S. Gellert

Ronald S. Gellert (DE 4259)